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*Attorneys for Mark D. Waldron,  
Chapter 11 Trustee*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington  
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

Chapter 11

**CHAPTER 11 TRUSTEE'S EX  
PARTE MOTION FOR RULE 2004  
ORDER**

Mark D. Waldron, in his official capacity as the Chapter 11 Trustee (the  
“**Trustee**”), hereby moves the Court for an *ex parte* order directing Public Utility  
District No. 1 of Douglas County, Washington (the “**PUD**”) to produce to the  
Trustee at the offices of Beveridge & Diamond, PC, 600 University Street, Suite  
1601, Seattle, WA 98101, the documents described in **Exhibit A** hereto on or  
before Friday, September 4, 2020, at 12:00 p.m.

Chapter 11 Trustee's Ex Parte Motion for Rule  
2004 Order - Page 1

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Seattle, WA 98101  
206-315-4800

1 The purpose of the examination is to inquire into certain facts and  
2 circumstances surrounding the March 7, 2017, Interconnection and Service  
3 Agreement between the PUD and Giga Watt, which obligated the PUD to  
4 construct electric facilities and provide electric service to the Giga Watt facility at  
5 the Pangborn Airport Business Park, and to inquire into the facts and  
6 circumstances of certain agreements and arrangements related to the  
7 Interconnection and Service Agreement.

8 This Motion is brought pursuant to 11 U.S.C. § 105, Rule 2004 of the  
9 Federal Rules of Bankruptcy Procedure and Rule 2004-1 of the Local Bankruptcy  
10 Rules of this Court.

11 This Motion is without prejudice to the Trustee's right, and the Trustee  
12 expressly reserves the right, to request further documents and an examination  
13 pursuant to further Order of this Court.

14 Dated: July 30, 2020

15 **BEVERIDGE & DIAMOND, P.C.**

16 /s/Eric L. Christensen

17 Eric L. Christensen, WSBA No. 27934

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19 Seattle, WA 98101

20 E: [EChristensen@bdlaw.com](mailto:EChristensen@bdlaw.com)

21 Counsel for Mark D. Waldron,

22 in his official capacity as the Chapter 11 Trustee

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Dated this 30 day of July 2020.

/s/Eric L. Christensen  
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in his official capacity as the Chapter 11 Trustee